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6
7 IN THE UNITED STATES DISTRICT COURT
8 EASTERN DISTRICT OF CALIFORNIA
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10
11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 APPROXIMATELY \$1,537,494.74
SEIZED FROM CHASE BANK, and

15 APPROXIMATELY \$2,601.24 SEIZED
16 FROM BANK OF AMERICA,

17 Defendants.
18

2:21-MC-00199-WBS-JDP

STIPULATION AND ORDER EXTENDING TIME
FOR FILING A COMPLAINT FOR FORFEITURE
AND/OR TO OBTAIN AN INDICTMENT
ALLEGING FORFEITURE

19 It is hereby stipulated by and between the United States of America and potential claimant Ru
20 Cong Ye (“claimant”), by and through their respective counsel, as follows:

21 1. On or about May 24, 2021, claimants filed a claim in the administrative forfeiture
22 proceeding with the U.S. Customs and Border Protection (“CBP”) with respect to the Approximately
23 \$1,537,494.74 seized from Chase Bank and Approximately \$2,601.24 seized from Bank of America
24 (hereafter “defendant funds”), which were seized on August 3, 2020 and August 4, 2020.

25 2. CBP has sent the written notice of intent to forfeit required by 18 U.S.C. § 983(a)(1)(A) to
26 all known interested parties. The time has expired for any person to file a claim to the defendant funds
27 under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimant has filed a claim to the defendant
28 funds as required by law in the administrative forfeiture proceeding.

1 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for
2 forfeiture against the defendant funds and/or to obtain an indictment alleging that the defendant funds are
3 subject to forfeiture within ninety days after a claim has been filed in the administrative forfeiture
4 proceeding, unless the court extends the deadline for good cause shown or by agreement of the parties.
5 That deadline was August 22, 2021.

6 4. By Stipulation and Order filed August 23, 2021, the parties stipulated to extend to
7 September 21, 2021, the time in which the United States is required to file a civil complaint for forfeiture
8 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to
9 forfeiture.

10 5. By Stipulation and Order filed September 22, 2021, the parties stipulated to extend to
11 October 21, 2021, the time in which the United States is required to file a civil complaint for forfeiture
12 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to
13 forfeiture.

14 6. By Stipulation and Order filed October 21, 2021, the parties stipulated to extend to
15 November 22, 2021, the time in which the United States is required to file a civil complaint for forfeiture
16 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to
17 forfeiture.

18 7. By Stipulation and Order filed November 22, 2021, the parties stipulated to extend to
19 December 22, 2021, the time in which the United States is required to file a civil complaint for forfeiture
20 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to
21 forfeiture.

22 8. By Stipulation and Order filed December 27, 2021, the parties stipulated to extend to
23 January 11, 2022, the time in which the United States is required to file a civil complaint for forfeiture
24 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to
25 forfeiture.

26 9. By Stipulation and Order filed January 18, 2022, the parties stipulated to extend to
27 February 10, 2022, the time in which the United States is required to file a civil complaint for forfeiture
28 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to

1 forfeiture.

2 10. By Stipulation and Order filed February 10, 2022, the parties stipulated to extend to
3 March 11, 2022, the time in which the United States is required to file a civil complaint for forfeiture
4 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to
5 forfeiture.

6 11. By Stipulation and Order filed March 11, 2022, the parties stipulated to extend to April
7 11, 2022, the time in which the United States is required to file a civil complaint for forfeiture against the
8 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

9 12. By Stipulation and Order filed April 12, 2022, the parties stipulated to extend to May 11,
10 2022, the time in which the United States is required to file a civil complaint for forfeiture against the
11 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

12 13. By Stipulation and Order filed May 11, 2022, the parties stipulated to extend to June 10,
13 2022, the time in which the United States is required to file a civil complaint for forfeiture against the
14 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

15 14. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend
16 to July 11, 2022, the time in which the United States is required to file a civil complaint for forfeiture
17 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to
18 forfeiture.

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3 15. Accordingly, the parties agree that the deadline by which the United States shall be
4 required to file a complaint for forfeiture against the defendant funds and/or to obtain an indictment
5 alleging that the defendant funds are subject to forfeiture shall be extended to July 11, 2022.

6 Dated: 6/9/2022

PHILLIP A. TALBERT
United States Attorney


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8 By: /s/ Kevin C. Khasigian
KEVIN C. KHASIGIAN
Assistant United States Attorney

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10 Dated: 6/9/2022

/s/ Seth P. Chazin
SETH P. CHAZIN
Attorney for potential claimant
Ru Cong Ye
(Signature authorized by phone)

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14 **IT IS SO ORDERED.**

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16 Dated: June 13, 2022


WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE